UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re:

TS EMPLOYMENT, INC.,

Debtors.

JAMES FELTMAN, not individually but solely as chapter 11 trustee for TS Employment, Inc.,

Plaintiff,

- against -

KOSSOFF & KOSSOFF LLP and IRWIN KOSSOFF,

Defendants.

Chapter 11

No. 15-bk-10243-mg

No. 18-ap-1649-mg

NOTICE OF DEFENDANTS' MOTION TO WITHDRAW THE BANKRUPTCY REFERENCE

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and declaration of Jeffrey Chubak, both dated August 27, 2019, the above-named Defendants move this Court for an order withdrawing the reference of the above-captioned adversary proceeding to the Bankruptcy Court for purposes of trial on completion of discovery, pursuant to 28 U.S.C. § 157(d), and for such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1(b), opposition papers must be served within fourteen days following service of Defendants' moving papers.

Dated: August 27, 2019 New York, New York STORCH AMINI PC

/s/ Jeffrey Chubak

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